

**DECLARATION OF DANIEL T. YOUNG**

I, Daniel T. Young, declare:

1. I am over the age of eighteen (18). Unless otherwise indicated, I have personal knowledge of the matters set forth in this declaration, and I am competent to testify to the following.

2. I am currently the Assistant Secretary of The Goodyear Tire & Rubber Company. I have been an employee of the company since 2007.

3. By virtue of my tenure with The Goodyear Tire & Rubber Company, I am generally familiar with its United States business operations, its relationship with company-owned and authorized retailers that sell Goodyear tires, and the location of The Goodyear Tire & Rubber Company's businesses, including its manufacturing facilities.

4. The Goodyear Tire & Rubber Company is incorporated under the laws of the State of Ohio.

5. The Goodyear Tire & Rubber Company maintains its corporate headquarters, which serves as its principal place of business, at 200 Innovation Way in Akron, Ohio.

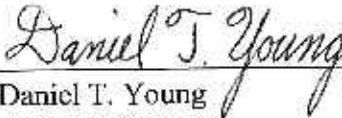
6. The Goodyear Tire & Rubber Company is not domiciled in the Commonwealth of Pennsylvania, and it is not a "domestic" entity in Pennsylvania.

7. To the best of my knowledge and belief, The Goodyear Tire & Rubber Company is not and never has been related to a Pennsylvania business entity known as "Goodyear Tire & Rubber Company," does not do business as "Goodyear Tire & Rubber Company," and has not permitted "Goodyear Tire & Rubber Company" to do business as The Goodyear Tire & Rubber Company.

8. To the best of my knowledge and belief, The Goodyear Tire & Rubber Company is not and never has been related to a Pennsylvania business entity known as "Goodyear Tire & Rubber Company," does not do business as "Goodyear Tire & Rubber Company," and has not permitted "Goodyear Tire & Rubber Company" to do business as The Goodyear Tire & Rubber Company. In fact, I have been informed that the Pennsylvania Department of State does not recognize any such entity.

9. In any event, upon information and belief, the tire at issue was designed and manufactured by The Goodyear Tire & Rubber Company—an entity organized under the laws of Ohio and headquartered in Akron, Ohio.

I declare under penalty of perjury that the foregoing is true and correct. This declaration was executed on August 1, 2017, at Akron, OH.

  
Daniel T. Young  
Assistant Secretary